



In the Matter Of:

TERRANCE PRUDE vs CANDACE DIXON

23-CV-1233

JALEEL SCHULTZ

June 19, 2024



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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

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TERRANCE PRUDE,
Plaintiff,
-vs- Case No. 23-CV-1233
CANDACE DIXON,
Defendant.

* * * * *

VIDEOCONFERENCE DEPOSITION OF JALEEL SCHULTZ
Wednesday, June 19, 2024
1:09 p.m.
Reported by: SANDRA L. McDONALD

<p style="text-align: right;">Page 2</p> <p>1 VIDEOCONFERENCE DEPOSITION of JALEEL SCHULTZ, 2 a witness of lawful age, taken on behalf of the 3 defendant in the above-entitled cause, under the 4 Federal Rules of Civil Procedure, pursuant to notice, 5 before SANDRA L. McDONALD, a Notary Public in and for 6 the State of Wisconsin, from various remote 7 locations, on the 19th day of June, 2024, commencing 8 at 1:09 p.m.</p> <p style="text-align: center;">* A P P E A R A N C E S *</p> <p>10 TERRANCE PRUDE, 11 DOC Inmate No. 335878 12 WISCONSIN SECURE PROGRAM FACILITY 13 P.O. Box 1000 14 Boscobel, Wisconsin 53805 15 appearing by videoconference on his 16 own behalf; 17 JONATHON M. DAVIES and SAMIR S. JABER, 18 Assistant Attorneys General 19 WISCONSIN DEPARTMENT OF JUSTICE 20 17 West Main Street 21 Madison, Wisconsin 53703 22 daviesjm@doj.state.wi.us 23 jaberss@doj.state.wi.us 24 appearing by videoconference on 25 behalf of the defendant.</p> <p style="text-align: center;">* I N D E X *</p> <p>20 Examination By: Page: 21 Attorney Davies 3</p> <p>22 23 (There were no exhibits marked for identification) 24 25 (Original transcript filed with the DOJ)</p>	<p style="text-align: right;">Page 4</p> <p>1 A Yeah, more than five. 2 Q More than 10? 3 A Yeah, more than 10. 4 Q More than 15? 5 A No. 6 Q Okay, all right. So I'm going to start just kind of 7 by explaining the process here to make sure we're on 8 the same page. Now, during this deposition I'm going 9 to be asking you questions. You're under oath. The 10 reporter just put you under oath, and you'll be 11 answering the questions.</p> <p>The reporter that you see on the screen is going 12 to be writing down the answers and the questions, and 13 the responses you give might be used in court later. 14 Do you understand that you have a legal obligation to 15 tell the truth today? 16 A Yeah. 17 Q And do you understand that you could be charged with 18 perjury if you don't tell the truth? 19 A Yeah, but I don't even -- what am I here for? 20 Q Well, we'll get into that in a minute. For right now 21 I just want to make sure we're on the same page about 22 how this is going to work. So if you don't 23 understand a question that I ask you, will you tell 24 me that? 25</p>
<p style="text-align: right;">Page 3</p> <p>1 JALEEL SCHULTZ, 2 having been first duly sworn on oath, 3 was examined and testified as follows: 4</p> <p style="text-align: center;">EXAMINATION</p> <p>6 BY MR. DAVIES: 7 Q Mr. Schultz, thank you for being here today. As I 8 said, my name is Jonathon Davies. I am the attorney 9 representing the defendants in Case No. 23-CV-1233. 10 I'm getting a little bit of distortion. Can you all 11 hear me okay? 12 MR. PRUDE: Yeah, I can hear you. 13 Q Okay. Mr. Schultz, have you ever been deposed 14 before? 15 A Excuse me? 16 Q Have you ever been deposed before? 17 A I don't have the definition of what you're speaking. 18 Q Okay. Well, you're here today for a deposition in 19 this case. Do you know what a deposition is? 20 A Yes. 21 Q Okay. Have you ever been in a deposition before? 22 A Yeah. 23 Q Okay. How many depositions have you been in? 24 A I don't know. 25 Q More than five?</p>	<p style="text-align: right;">Page 5</p> <p>1 A Sure. 2 Q All right. And if you answer a question, I'm going 3 to assume that you understood it, okay? 4 A Yeah. I said yeah. 5 Q Okay, all right. Are you on my medications today 6 that could interfere with your memory? 7 A No. 8 Q Is there any reason you wouldn't be able to tell the 9 truth today? 10 A No. 11 Q All right. And then kind of a last groundskeeping 12 thing, the court reporter is going to be writing down 13 everything, like I said. She isn't able to write 14 down shakes of the head or shrugs of the shoulders, 15 right? So please do your best to give verbal 16 responses instead of shaking your head.</p> <p>And at the same time, we're on Zoom, which can 17 make things a little bit more difficult, so sometimes 18 there's a lag or sometimes people talk over each 19 other. If that happens, I'll just ask you to let me 20 finish my question before you answer, and I will try 21 and do my best for you or the same for you, okay? 22 A Yeah. 23 Q All right. So, Mr. Schultz, I'm just going to ask 24 you a few basic questions about your background, just 25</p>

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1	so we get a sense of where we're at. Can you tell me	1	A You said disposition, meaning like I thought you was
2	how old you are?	2	talking about like some shit in here or something.
3	A 25.	3	Q Okay, so let me clarify. So a deposition, a
4	Q All right. And before you went to prison what did	4	deposition is what we're doing right now where an
5	you do for a living?	5	attorney or a party asks you questions under oath but
6	A I was in the streets.	6	not in trial. Have you ever been in a deposition
7	Q And what's your highest level of education?	7	before?
8	A 11th grade.	8	A Oh, then hell no, no.
9	Q 11th grade, is that what you said?	9	Q No, all right. So we already touched on this a
10	A Yes.	10	little bit, but are you familiar at all with this
11	Q Okay. And when did you begin your current period of	11	case, which is Terrance Prude against Candace Dixon?
12	incarceration?	12	A I'm familiar with it.
13	A Seven years ago. I was 18.	13	Q Okay. What do you know about it?
14	Q All right. And what are you in for?	14	A I mean, shit, I just was aware of what I guess took
15	A Second degree reckless homicide.	15	place or whatever. I still don't see what I've got
16	Q Did you go to trial for that or was that on a plea	16	to do with this, though.
17	deal, a plea agreement?	17	Q All right.
18	A It was a plea deal.	18	MR. PRUDE: I would like to make an
19	Q All right. And when do you expect to be released?	19	objection. There was a confusion between Jamil
20	A Shit, 2046.	20	and Jaleel. There was -- I don't understand why
21	Q All right. Prior to your current period of	21	he's here, but Jamil is not Jaleel Schultz.
22	incarceration were you ever incarcerated before?	22	Jamil should be in that seat, not Jaleel
23	A Yeah, in Lincoln Hills.	23	Schultz. I think I corrected that previously,
24	Q What was that for?	24	that Jaleel is different from Jamel, just for
25	A Felonious assault and shit, breaking and entering,	25	record purposes.
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1	some shit like that.	1	MR. DAVIES: All right. We appear to
2	Q Do you have any pending criminal cases right now,	2	have a little bit of a mix-up then. Mr. Prude,
3	cases that haven't been resolved yet?	3	can you spell the name of the inmate that you
4	A No, I ain't got no pending cases.	4	believe is involved in the case?
5	Q Okay.	5	MR. PRUDE: I believe I filed it with
6	MR. PRUDE: All right. I would like	6	the Court. I made a correction on the Court
7	to object. His criminal background, his history	7	that Jaleel Schultz is not Jamil, J-a-m-i-l, not
8	is irrelevant to these proceedings.	8	J-a-l-e-e-l.
9	MR. DAVIES: All right, Mr. Prude,	9	Yeah, I guess it's a coincidence that
10	thank you. Your objection is noted.	10	under the report that I received that it was a
11	Q Mr. Schultz, have you ever filed any other lawsuits	11	couple people, according to Cushing. According
12	as a plaintiff?	12	to Captain Cushing, there was a couple people
13	A Excuse me?	13	who was supposedly involved with Candace Dixon,
14	Q Have you ever filed any lawsuits as a plaintiff?	14	and I didn't even know that this was allegedly
15	Have you ever filed a suit against anybody?	15	the individual. But Jamil is the person that
16	A No.	16	identified Candace Dixon, and Jaleel is not a
17	Q Have you ever been a defendant in a civil lawsuit,	17	relationship. So Jamil is the one who should be
18	not your criminal case, but civil cases?	18	deposed and not Jaleel.
19	A No.	19	MR. DAVIES: Okay. So, Mr. Prude,
20	Q All right. Have you ever been a witness in another	20	just to be clear, the person that you think
21	civil lawsuit?	21	should be deposed is spelled J-a-m-i-l?
22	A No.	22	MR. PRUDE: Yeah. Jamie is the first
23	Q Okay. Earlier you said that you had been deposed	23	name. Jamie's nickname is Jamil, not Jaleel.
24	previously between 10 and 15 times. Were those in	24	But I guess in one of y'all's reports y'all
25	civil cases?	25	somehow found everybody that's supposed to be

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1	having a relationship with her, and I guess	1	inmate or prison official?
2	y'all just decided to depose him or something.	2	A No.
3	I don't know, but this Jaleel is not Jamil.	3	Q Are you aware of anybody you know having nude
4	I don't even know this person. I've never seen	4	photographs?
5	him before. I was in Green Bay, but I don't	5	A No, um-hum.
6	even know him.	6	Q Have you ever heard of another inmate having nude
7	MR. DAVIES: All right. Let's go off	7	photographs of an inmate or a prison official?
8	the record for a second.	8	Mr. Schultz?
9	(Discussion off the record)	9	MR. PRUDE: I don't know what
10	MR. DAVIES: All right. We'll go back	10	happened. I think I went out or something. I
11	on the record.	11	missed it.
12	Q Mr. Schultz, what are your understanding -- or what	12	Q Yeah, me too. Mr. Schultz, can you still hear me?
13	is your understanding of Mr. Prude's allegations in	13	A Yes, I hear you.
14	this case?	14	Q Okay. Have you ever heard of another inmate having
15	A I was told that I supposedly did something to incite	15	nude photographs of a prison official or another
16	somebody getting stabbed or something like that.	16	inmate?
17	Q Who told you that?	17	A No.
18	A Dixon.	18	Q All right. Mr. Schultz, in this case Mr. Prude
19	Q Okay. And when you say Dixon, are you referring to	19	alleges that he was stabbed on March 11, 2023. Do
20	Candace Dixon?	20	you know anything about that stabbing?
21	A Candace Dixon, yep.	21	MR. PRUDE: Objection. I already made
22	Q All right. Do you know Mr. Prude? When did you	22	a correction. It was not Jaleel, it was Jamil.
23	first meet Mr. Prude?	23	So it's irrelevant to say that I said anything
24	A I don't know this man.	24	in reference to him, because I've already
25	Q All right. Have you ever spoken with him before in	25	corrected and clarified that Jamil is not
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1	your life?	1	Jaleel.
2	A I've never seen him a day in my life.	2	MR. DAVIES: I understand, and I'm
3	Q Okay, all right. I'll just tell you the	3	just simply asking if this Mr. Schultz knows
4	allegations in this also revolve around an individual	4	anything about it. If he doesn't, that's fine.
5	named Titus Henderson. Do you know a man named	5	Q So, Mr. Schultz, do you know anything about whether
6	Titus Henderson?	6	Mr. Prude was stabbed on March 11, 2023?
7	A No, never heard of him, never met him.	7	A I was in Seg, so no.
8	Q Okay. And just to be super clear on both of these	8	Q All right. Have you ever discussed this case with
9	points, have you ever exchanged any correspondence or	9	any other inmate?
10	any messages with Mr. Prude or Mr. Henderson?	10	MR. PRUDE: Hey, hang on. Let me ask
11	A I never heard of any incident at all.	11	the police to come in here and cut loose of this
12	Q Okay. Have you ever written to them or received a	12	cuff. This cuff tightened up on me.
13	written letter from either of them?	13	MR. DAVIES: Let's go off the record
14	A Never.	14	for a minute.
15	Q Have you ever communicated to either of them through	15	(Discussion off the record)
16	another inmate or a prison officer?	16	MR. DAVIES: Okay. We'll go back on
17	A Never.	17	the record, all right.
18	Q All right. And, Mr. Schultz, are you -- have you	18	Q Mr. Schulz, did you discuss your deposition today
19	ever been in the possession of any pornographic	19	with anybody ahead of time?
20	material while you were incarcerated?	20	A No. You said in here?
21	A Excuse me?	21	Q With anybody, so did you discuss that you were going
22	Q Have you ever been in possession of any pornographic	22	to have a deposition today with anybody?
23	materials while you were incarcerated?	23	A Yeah.
24	A No.	24	Q With who?
25	Q Have you ever had nude photographs of any other	25	A Candace Dixon.

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1	Q Okay. And when did you discuss this with her?	1	A I don't know Mr. Prude.
2	A Oh, whenever I got something in the mail. I don't	2	Q All right. Have you ever had any altercations or
3	know what day it was.	3	disagreements with a member of the Gangster
4	Q Okay. And what did you tell her?	4	Disciples?
5	A I just told her that they ordered me to come to this	5	A Not necessarily, no.
6	whatever this is right here and that basically if I	6	Q What do you mean by not necessarily?
7	didn't show up I would be in contempt and could be	7	A In prison?
8	charged with contempt and something, obstruction.	8	Q In prison or before prison.
9	That's all I really said.	9	A Prison, just period, since my incarceration I never
10	MR. PRUDE: Hold on. He's saying that	10	had a problem with the Gangster Disciplines.
11	wasn't the Notice of Deposition? He's saying	11	Q Okay. Before your incarceration did you have an
12	that's what Candace told him directly?	12	altercation?
13	MR. DAVIES: Mr. Prude, I believe	13	A Before prison?
14	that's what he told Ms. Dixon.	14	Q Yeah.
15	MR. PRUDE: Oh, not the deposition	15	A No. I mean, it depends like on what you mean. I
16	notice that you sent me, right?	16	mean, as a child, being a child, I mean, I had fights
17	THE WITNESS: No, it was from the	17	with people that was what you would call, I guess, a
18	courts. It was just basically -- I think it was	18	Gangster Disciple, but I wouldn't determine that it
19	that paper that he's got basically telling me	19	was because of them being a Gangster Disciple, no.
20	that I had to come to court and if not I could	20	MR. DAVIES: All right. Let's take a
21	be charged with contempt of court and shit like	21	two-minute break, and we'll come back if there's
22	that. I don't know.	22	anything else. Otherwise, we'll hand it over to
23	MR. PRUDE: So it wasn't Candace Dixon	23	you, Mr. Prude. We'll take a break for two
24	that notified you?	24	minutes.
25	THE WITNESS: No. I notified her that	25	MR. PRUDE: All right.

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1	I got piece of paper stating that I had to show	1	(A recess is taken)
2	up on her behalf -- or I mean on this whatever.	2	(1:30 p.m. to 1:33 p.m.)
3	MR. PRUDE: Oh, okay.	3	MR. DAVIES: All right. Mr. Schultz,
4	MR. DAVIES: All right. Mr. Prude,	4	thank you for your time today. I don't have any
5	you'll get a chance to ask your questions at the	5	more questions for you right now. Mr. Prude,
6	end, but for now, let me just get through mine,	6	did you have any questions you want to ask?
7	and then it will be your turn.	7	MR. PRUDE: Yeah, I did.
8	MR. PRUDE: Okay.	8	EXAMINATION
9	Q All right. Mr. Schultz, are you familiar with an	9	BY MR. PRUDE:
10	organization called the Gangster Disciples?	10	Q Were you ever interviewed by prison -- were you ever
11	A Yes, I am.	11	interviewed by any prison officials related to this
12	Q What do you know about them?	12	alleged relationship with Candace Dixon?
13	A I mean, what is there not to know? I mean, it's a	13	A My -- on my relationship with Candace Dixon, yes, I
14	gang out of Chicago. That's pretty much it.	14	was interviewed.
15	Q Have you ever been a member of the Gangster	15	Q Who were you interviewed by?
16	Disciples?	16	A Cushing.
17	A Involved? No.	17	Q All right. It was only Cushing interviewing you, or
18	Q All right. Have you ever been involved with an	18	was there another staff?
19	organization called Brothers of the Struggle?	19	A Captain Cushing.
20	A No. What the fuck is that?	20	Q All right. Do you remember admitting in the report
21	Q Okay. Well, it sounds like you've answered my next	21	to Cushing that you and Candace have a relationship?
22	question. Do you know what that group is?	22	Did you ever admit that?
23	A No.	23	A Not verbally, no.
24	Q Okay. Do you know if Mr. Prude was a member of the	24	Q Would it surprise you if there was a report written
25	Gangster Disciples?	25	by Cushing saying that you admitted to having a

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1	relationship with Candace Dixon?	1	A 120 days disposition.
2	A Yeah, I believe that he was listening to my phone	2	Q But they did not classify you as a victim?
3	calls and heard me admit it to her on the phone.	3	A No.
4	Q I'm reading a report written by Cushing which says,	4	MR. DAVIES: Objection, relevance.
5	"During an interview with Schultz he admitted that	5	Q Do you know the difference between a civil lawsuit
6	Ms. Dixon had been sending emails to him." Do you	6	and a criminal prosecution?
7	recall that?	7	A Yes.
8	MR. DAVIES: Mr. Prude --	8	Q Do you know which one this is?
9	A I do recall that. I do recall that being in the	9	A Yes.
10	report, but that's inaccurate. Like I said, it's	10	Q What is it?
11	possible that he heard me talking to her on the	11	A Well, it can be a combination of both really, because
12	phone, but as far as a me and him verbal	12	it can -- it can lead to a criminal lawsuit rather
13	back-and-forth conversation, it led nowhere.	13	than it being a civil lawsuit, I guess.
14	MR. DAVIES: Mr. Prude, could you	14	Q Yeah, that's probably true, but I'm asking do you
15	please tell us what document you're looking at	15	know what this is, what this current action is. Is
16	for the reader's benefit?	16	this a criminal case or a civil case?
17	MR. PRUDE: We'll talk -- we'll talk	17	A I believe it to be a civil case.
18	about it later. Let me continue with my	18	Q Okay. Are you familiar with Seandell Jackson?
19	deposition.	19	MR. DAVIES: Objection, relevance.
20	Q Are you familiar with PREA, the Prison Rape	20	A I've heard the name before.
21	Elimination Act?	21	Q Are you familiar with a Jamil, real name Jamie,
22	MR. DAVIES: Objection, relevance.	22	nickname Jamil?
23	A Yes, I am.	23	A No.
24	Q Are you aware that an inmate cannot consent to having	24	Q Would it surprise you that Dixon had a relationship
25	a relationship with a guard?	25	with multiple inmates?
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1	A Yes.	1	A No.
2	Q Are you aware that in this report Cushing identified	2	Q Are you aware of any Facebook posts made by
3	Candace as mailing you photographs of her? In this	3	Candace Dixon where she admitted to having a
4	report, are you familiar with that allegation?	4	relationship with inmates in prison since being
5	A Yes.	5	fired?
6	Q Are you familiar with the fact that under PREA you	6	MR. DAVIES: Objection as to form and
7	would be classified as a victim?	7	relevance.
8	MR. DAVIES: Objection, relevance.	8	Q You can answer the question.
9	Q You can answer. Are you aware that under PREA saying	9	A I suppose it's me.
10	that you can't consent to having a relationship with	10	Q Are you aware --
11	a guard that you would be classified as a victim?	11	THE REPORTER: Wait. I'm sorry, sir.
12	MR. DAVIES: Objection, relevance.	12	Repeat your last answer.
13	A Yes.	13	THE WITNESS: Me?
14	Q When Cushing interviewed you did he identify you as	14	THE REPORTER: Yes.
15	being a PREA victim?	15	A I suppose it's me, just me that I'm aware of.
16	A No.	16	Q Are you aware of any other inmates that she made
17	Q Did anybody ever notify you that you were a PREA	17	Facebook posts about in relation to her having a
18	victim?	18	relationship with them?
19	A No.	19	MR. DAVIES: Objection, assumes facts
20	MR. DAVIES: Objection, relevance.	20	not in evidence and relevance.
21	Q Prison officials didn't punish you behind the	21	Q You can answer.
22	allegations regarding Dixon, did they?	22	A No.
23	A Yes.	23	Q Okay. Now, Candace, since she stopped working at
24	Q What did they do?	24	GBCI, has she ever tried to contact you since, I
25	MR. DAVIES: Objection, relevance.	25	guess, leaving the institution?

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1	A Yes.	1	A No.
2	MR. DAVIES: Objection, relevance.	2	MR. DAVIES: Objection, hearsay.
3	Q You said yes?	3	Q Did Candace notify you that Jamil -- or that Cushing
4	A Yes.	4	notified her that Jamil informed him of y'all's
5	Q Has she notified you about anything relevant to this	5	relationship?
6	case?	6	A No.
7	A I mean, she filled me in with her understanding of	7	Q So you said it was not true or was it true that -- I
8	everything that took place.	8	guess in the report Cushing indicated that Candace
9	Q And what did she say it was?	9	sent you some nude photos of her. Did you confirm to
10	A Supposedly that she told --	10	him that that was true, or was that just his
11	MR. DAVIES: Objection, relevance.	11	position?
12	A That she told you that you were going to be stabbed	12	A I mean, that was -- I never received any nude photos.
13	or something like that, and supposedly that I	13	I know that nudity consists of naked pictures. If
14	supposedly put the hit in because of something about	14	I'm -- if I'm being completely correct with myself,
15	you weren't supposed to be talking to her or	15	I mean, nudity is without clothing. I never received
16	something like that. And, I mean, that pretty much	16	any pictures without clothing.
17	sums it up.	17	Q Okay. Did ever receive or did you ever admit to
18	Q That's what she told you?	18	receiving photos -- did you admit to receiving photos
19	A Yeah.	19	of Candace of any sort to Cushing?
20	Q That was while this case was pending, right?	20	A I never admitted to anything with Cushing.
21	A I'm not sure. I don't -- I don't know how long this	21	Q So if Cushing created a report saying you did, that
22	case has been pending, honestly.	22	would be a false report?
23	Q Well, how long ago did she tell you this?	23	A From my exact knowledge, yes, it's a false report.
24	A Like October, November, possibly December.	24	Q Okay.
25	Q Your name only came up recently in the last, I	25	A As I said, the allegations of me admitting to it, I
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1	believe, couple months, so she notified you before	1	never admitted to him. I did have a conversation
2	your name popped up in this case?	2	with Candace on a jail call that we -- that I was
3	A Yeah, she notified me before.	3	going to come out that we was in a relationship
4	Q Do you know why she would notify you before your name	4	because I did not want to keep it a secret any
5	ever popped up in this case?	5	longer, and she agreed to it. So, therefore, we just
6	MR. DAVIES: Objection, calls for	6	exposed it on the phone.
7	speculation.	7	Q All right. So how long have y'all had a
8	A She tells me a lot of shit. I'm not sure.	8	relationship?
9	Q Well, I guess I'm just curious since your name only	9	A About like two years or something, a little over two,
10	popped up in this case probably like a month or two	10	something like that.
11	ago, but you're saying she notified you in April or	11	Q Would you think she cheated on you if she was messing
12	October -- I mean October, November or December of	12	with another inmate?
13	last year. I was just curious about that, but all	13	MR. DAVIES: Objection, relevance.
14	right.	14	A No.
15	A Yeah, she just recently notified me that my name was	15	Q So it's safe to say y'all had an open relationship?
16	brought up I think in the last couple of months.	16	A I just want to say it's safe to say that I never was
17	Q All right, okay. How tall are you?	17	aware of her talking to any other individual until
18	MR. DAVIES: Objection, relevance.	18	Cushing pulled out some pictures that I know that she
19	A 6'2".	19	didn't send to me, some cards that I know she didn't
20	MR. PRUDE: Facts not in evidence	20	send to me. That's when I was aware that she was
21	about how tall he is?	21	talking to another individual that I suspected to be
22	A 6'2".	22	Seandell Jackson.
23	Q All right. During your interview with Cushing did he	23	Q Okay. But you're not aware of who Jamil is?
24	notify you that Jamil notified him of your	24	A I never heard of that name.
25	relationship with Candace Dixon?	25	MR. PRUDE: I have no further

<p style="text-align: right;">Page 26</p> <p>1 questions.</p> <p>2 RE-EXAMINATION</p> <p>3 BY MR. DAVIES:</p> <p>4 Q All right. Mr. Schultz, I'll be very brief, just a</p> <p>5 couple follow-up questions. When you discussed this</p> <p>6 case with Ms. Dixon, you told Mr. Prude just now that</p> <p>7 she had described the allegations against her. Did</p> <p>8 she ever indicate to you that they were true?</p> <p>9 A Indicate what?</p> <p>10 Q That the allegations against her in this case were</p> <p>11 true?</p> <p>12 A Never.</p> <p>13 Q Okay. So I just want to clarify your testimony.</p> <p>14 When you said that Ms. Dixon told you that Mr. Prude</p> <p>15 alleged that she had, you know, told him that he was</p> <p>16 going to be stabbed, was that just her telling you</p> <p>17 the allegations or was that her admitting that they</p> <p>18 were true?</p> <p>19 A That was her telling me the allegations.</p> <p>20 MR. DAVIES: Thank you. I have no</p> <p>21 other questions for you, Mr. Schultz. While</p> <p>22 we're still on the record, Mr. Prude, would you</p> <p>23 please tell us what document you were reading</p> <p>24 off of during your questions?</p> <p>25 MR. PRUDE: I would like to redirect</p>	<p style="text-align: right;">Page 28</p> <p>1 questions.</p> <p>2 MR. DAVIES: Mr. Prude, can you please</p> <p>3 tell me what document you were reading off of</p> <p>4 during your questioning?</p> <p>5 MR. PRUDE: You can do a discovery</p> <p>6 request, kind of like you told me to do with the</p> <p>7 deposition when I tried to get it. Just ask me</p> <p>8 for -- do a discovery request, and we can figure</p> <p>9 it out that way.</p> <p>10 MR. DAVIES: Well, Mr. Prude, I think</p> <p>11 that both Mr. Schultz and myself have a right to</p> <p>12 know what document you're reading off of, but if</p> <p>13 that's your position, we can take that up with</p> <p>14 the Court, if needed.</p> <p>15 MR. PRUDE: This deposition is not for</p> <p>16 me. I don't -- I'm telling you you can do a</p> <p>17 discovery request and ask me for documents and I</p> <p>18 will furnish them.</p> <p>19 MR. DAVIES: Understood, Mr. Prude.</p> <p>20 And then again just so the record is clear, I</p> <p>21 want to be ultra clear about the spellings of</p> <p>22 the names. This Mr. Schultz is Jaleel,</p> <p>23 J-a-l-e-e-l, and you're saying that the relevant</p> <p>24 witness should have been Jamil, J-a-m-i-l; is</p> <p>25 that correct?</p>
<p style="text-align: right;">Page 27</p> <p>1 real quick and ask a follow-up question.</p> <p>2 RE-EXAMINATION</p> <p>3 BY MR. PRUDE:</p> <p>4 Q When Dixon notified you of this case, what did you</p> <p>5 surmise from her informing you of this case? Did you</p> <p>6 think that she wanted you to help her, or what was</p> <p>7 your perspective as to why she was telling you about</p> <p>8 the details of this case?</p> <p>9 MR. DAVIES: Objection, calls for</p> <p>10 speculation.</p> <p>11 A I just simply took it as her expressing her situation</p> <p>12 that she was going through at the moment.</p> <p>13 Q Would you consider yourself to be her significant</p> <p>14 other?</p> <p>15 MR. DAVIES: Objection, relevance.</p> <p>16 A Excuse me?</p> <p>17 Q I said would you consider yourself to be her</p> <p>18 significant other?</p> <p>19 A Kind of, I guess.</p> <p>20 MR. DAVIES: Objection, beyond the</p> <p>21 scope of this deposition and this case.</p> <p>22 Q So would it be fair to say that she told you that she</p> <p>23 believed that maybe you would help her out?</p> <p>24 A No.</p> <p>25 MR. PRUDE: Okay. No further</p>	<p style="text-align: right;">Page 29</p> <p>1 MR. PRUDE: Are you talking to Sandy</p> <p>2 or me?</p> <p>3 MR. DAVIES: To you, Mr. Prude.</p> <p>4 MR. PRUDE: Oh. Can you repeat that?</p> <p>5 MR. DAVIES: Yeah. I just want to</p> <p>6 make sure that the record is clear and that we</p> <p>7 all understand the names here. So the</p> <p>8 Mr. Schultz that we're deposing right now is</p> <p>9 spelled J-a-l-e-e-l and the witness that you say</p> <p>10 is relevant should have been J-a-m-i-l; is that</p> <p>11 right.</p> <p>12 MR. PRUDE: Correct. I don't know if</p> <p>13 that's the real name or the nickname, but</p> <p>14 correct.</p> <p>15 MR. DAVIES: Okay. But the same last</p> <p>16 name, S-c-h-u-l-t-z?</p> <p>17 MR. PRUDE: No, I don't know if it's</p> <p>18 the same. I'm not sure. All I know is it's</p> <p>19 Jamil, not Jaleel. I think I got the last name</p> <p>20 from y'all, from y'all when you sent me the</p> <p>21 order. I believe I received some documents, and</p> <p>22 I assumed that Jamil was Jaleel. Looking at</p> <p>23 him, Jaleel is not Jamil.</p> <p>24 MR. DAVIES: Okay, all right. I think</p> <p>25 we are done here. Thank you, Mr. Schulz, for</p>

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1 your time, and Mr. Prude as well. And we will
2 go off the record.

3 THE REPORTER: I just have one
4 question. Could the witness please spell your
5 first and last name for me? Mr. Schultz, could
6 you please spell your first and last name for
7 me?

8 THE WITNESS: It's J-a-l-e-e-l, first
9 name, Schultz, S-c-h-u-l-t-z.

10 THE REPORTER: Thank you.

11 THE WITNESS: And also, my first name
12 is not Jaleel, it's pronounced Jaleel.

13 THE REPORTER: Thank you.

14 MR. DAVIES: All right. Thank you,
15 everybody. Have a good day.

16 (Adjourned at 1:54 p.m.)
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1 STATE OF WISCONSIN)
)
2 COUNTY OF DANE)
3

4 I, SANDRA L. McDONALD, Shorthand Reporter
5 and Notary Public in and for the State of Wisconsin,
6 do hereby certify that the foregoing is a true
7 record of the videoconference deposition of
8 JALEEL SCHULTZ, who was first duly sworn by me;
9 having been taken on the 19th day of June, 2024, from
10 various remote locations, in my presence, and reduced
11 to writing in accordance with my stenographic notes
12 made at said time and place.

13 I further certify that I am not a relative
14 or employee or attorney or counsel for any of the
15 parties, or a relative or employee of such attorney
16 or counsel, or financially interested in said action.

17 In witness whereof, I have hereunto set my
18 hand and affixed my seal of office this 18th day of
19 July, 2024.

20 *Sandra L. McDonald*
21

Notary Public, State of Wisconsin

My Commission Expires 10/18/26

SANDRA L. McDONALD
Notary Public
State of Wisconsin

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